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Attorneys for Defendant,
 IPC SYSTEMS ENGINEERING, INC.

IN THE UNITED STATES DISTRICT COURT FOR THE
 CENTRAL DISTRICT OF CALIFORNIA

SARA G. MELENA, Individually and as
 Successor-in-Interest to the Estate of JOSE
 MELENA; ANTONIO MELENA,
 Individually; ALMA MELENA,
 Individually; PEDRO MELENA,
 Individually; SARA MELENA,
 Individually; EMMA CORTEZ,
 Individually; and CHRISTINA MELENA,
 Individually,

Plaintiffs,

v.

WSF INDUSTRIES, INC.; IPC SYSTEMS
 ENGINEERING, INC.; JOHN BEAN
 TECHNOLOGIES CORPORATION; JBT
 FOODTECH MADERA; TECHNICAL,
 INC.; and DOES 1 through 100, inclusive,

Defendants.

CASE NO.:
 CV 13-07321- DDP (AGRx)

“DISCOVERY MATTER”

NOTICE OF MOTION AND
 MOTION REGARDING THE
 SUFFICIENCY OF
 DISCOVERY OBJECTIONS
 AND TO COMPEL ANSWERS
 TO REQUESTS FOR
 ADMISSION
 [Fed R. Civ. P. 36(a)(6),
 37(a)(5)];

Date of Hearing: 5/26/15

Time of Hearing: 10:00 a.m.

Courtroom #: B

Hon. Alicia G. Rosenberg

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Please take notice that on May 26, 2015 at 10:00 a.m., or as soon thereafter
 as the parties may be heard, Defendant IPC SYSTEMS ENGINEERING, INC.
 will move this Court, at the United States Courthouse located at 312 North Spring

1 Street, Los Angeles, CA 90012-4701, Courtroom B, for:

2 (a) An order pursuant to Fed. R. Civ. P. 36(a)(6) determining that
3 Plaintiff's objections to requests for admission are insufficient and
4 compelling Plaintiff to serve answers to requests for admission.

5 (b) An order pursuant to Fed. R. Civ. P. 36(a)(6) and 37(a)(5) awarding
6 to IPC SYSTEMS ENGINEERING, INC. the expenses, including
7 attorney's fees, incurred in preparing and attending this motion.

8 Defendant IPC SYSTEMS ENGINEERING, INC. has complied with Local
9 Rule 37-1 and Plaintiffs have failed to confer as required by Local Rule 37-1. The
10 declaration required under Local Rule 37-2.4 accompanies this Motion as Exhibit
11 "C".

12 This motion is based on this Notice of Motion and Motion, the
13 accompanying Memorandum of Points and Authorities, the Exhibits which include
14 the Declaration of Walter E. Wendelstein, and the pleadings and papers on file in
15 this action.

16 Dated: April 22, 2015

17 Respectfully submitted,

18
19 /s/ _____

20 Walter E. Wendelstein

21 COHEN & BURGE, LLP

22 Attorneys for Defendant,

23 IPC SYSTEMS ENGINEERING, INC.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 23, 2015, I caused the forgoing document, **NOTICE OF MOTION AND MOTION REGARDING THE SUFFICIENCY OF DISCOVERY OBJECTIONS AND TO COMPEL ANSWERS TO REQUESTS FOR ADMISSION [Fed R.Civ. P.36(a)(6), 37(a)(5)]** to be served by U.S. Mail in sealed envelopes addressed as follows:

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/s/

Virginia Zareba